

# **EXHIBIT 72**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
  
IN RE JOHNSON & JOHNSON TALCUM )  
POWDER PRODUCTS MARKETING, ) MDL NO.  
SALES PRACTICIES, AND PRODUCTS ) 16-2738 (MAS) (RLS)  
LIABILITY LITIGATION

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ORAL DEPOSITION OF  
JUDITH WOLF, M.D.  
APRIL 25, 2024  
(VOLUME 2)

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ORAL DEPOSITION of JUDITH WOLF, M.D., produced  
as a witness at the instance of the Defendants, and duly  
sworn, was taken in the above-styled and numbered cause  
on the 25th day of April, 2024, from 8:58 a.m. to 11:16  
a.m., before Gabriela S. Silva, CSR, RPR in and for the  
State of Texas, reported by stenograph, at Aloft Austin  
Downtown, 109 East 7th Street, Austin, Texas, pursuant  
to the Federal Rules of Civil Procedure and the  
provisions stated on the record or attached hereto.

<p>1 APPEARANCES</p> <p>2</p> <p>3 COUNSEL FOR THE PLAINTIFF, STEERING COMMITTEE:</p> <p>4 P. LEIGH O'DELL</p> <p>5 MARGARET THOMPSON (via Zoom)</p> <p>6 MICHELLE PARFITT (via Zoom)</p> <p>7 BEASLEY ALLEN</p> <p>8 218 Commerce Street</p> <p>9 Montgomery, Alabama 36103</p> <p>10 (334) 269-2343</p> <p>11 Leigh.odell@beasleyallen.com</p> <p>12</p> <p>13 COUNSEL FOR THE STATE COURT PLAINTIFFS:</p> <p>14 RICHARD M. GOLOMB</p> <p>15 GOLOMB SPIRT GRUNFELD</p> <p>16 1835 Market Street, Suite 2900</p> <p>17 Philadelphia, Pennsylvania 19103</p> <p>18 (215) 985-9177</p> <p>19 Rgolomb@golomblegal.com</p> <p>20 COUNSEL FOR THE DEFENDANTS:</p> <p>21 MARK HEGARTY</p> <p>22 SHOOK, HARDY &amp; BACON, LLP</p> <p>23 2555 Grand Boulevard</p> <p>24 Kansas City, Missouri 64108</p> <p>25 (816) 474-6550</p> <p>Mhegarty@shb.com</p> <p>COUNSEL FOR PERSONAL CARE PRODUCTS COUNCIL:</p> <p>SUZANNE I. TURPIN (via Zoom)</p> <p>REILLY, MCDEVITT &amp; HENRICH, P.C.</p> <p>3 Executive Campus, Suite 310</p> <p>Cherry Hill, New Jersey 08002</p> <p>(856) 317-7180</p> <p>Sturpin@rmh-law.com</p>	<p>1 EXHIBITS</p> <p>2 Exhibit No. 1</p> <p>12/2023 Invoice..... 08</p> <p>3</p> <p>Exhibit No. 2</p> <p>4 01/2024 Invoice..... 09</p> <p>5 Exhibit No. 3</p> <p>Amended Rule 26 Expert Report of</p> <p>6 Shawn Levy, PHD..... 13</p> <p>7 Exhibit No. 4</p> <p>3rd Supplemental MDL Report..... 13</p> <p>8</p> <p>Exhibit No. 5</p> <p>9 Expert Report..... 13</p> <p>10 Exhibit No. 6</p> <p>Judith Wolf Bondurant Expert Report..... 25</p> <p>11</p> <p>Exhibit No. 7</p> <p>12 BondurantL-AGC-00004..... 25</p> <p>13 Exhibit No. 8</p> <p>Judith Wolf Gallardo Expert Report..... 34</p> <p>14</p> <p>Exhibit No. 9</p> <p>15 Gallardo_Anna_Drmutch_00001-004..... 34</p> <p>16 Exhibit No. 10</p> <p>Judith Wolf Judkins Expert Report..... 41</p> <p>17</p> <p>Exhibit No. 11</p> <p>18 JudkinsC_REC000003-009..... 41</p> <p>19 Exhibit No. 12</p> <p>Cancer Genetics Article..... 45</p> <p>20</p> <p>Exhibit No. 13</p> <p>21 Notice of Deposition of Judith Wolf,</p> <p>M.D., and Ducus Tecum Cancer</p> <p>22 Genetics Article..... 83</p> <p>23 Exhibit No. 14</p> <p>Plaintiffs' Steering Committee's Response</p> <p>24 And Objections to the Notice of Oral</p> <p>Deposition of Judith Wolf, M.D. and</p> <p>25 Ducus Tecum..... 83</p>
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<p style="text-align: right;">Page 62</p> <p>1 A. I don't understand that question. Amphibole is 10:24</p> <p>2 a form of asbestos. 10:24</p> <p>3 Q. Right. Do you know what form of asbestos he 10:24</p> <p>4 says that -- that he -- that tested positive? 10:24</p> <p>5 A. I don't -- I don't understand that question. 10:25</p> <p>6 MRS. O'DELL: Object to the form. 10:25</p> <p>7 Q. (By Mr. Hegarty) Well, do you know what types 10:25</p> <p>8 of asbestos he says he found from his testing? 10:25</p> <p>9 A. Other than what it says there? I don't know 10:25</p> <p>10 what you're asking. 10:25</p> <p>11 Q. Well, part -- whether based on this report or 10:25</p> <p>12 otherwise, do you know what -- for purposes of your 10:25</p> <p>13 opinion in this case, did you consider the particular 10:25</p> <p>14 types of asbestos Dr. Longo claims he found in Johnson's 10:25</p> <p>15 Baby Powder or Shower to Shower? 10:25</p> <p>16 A. Well, all types of asbestos are considered 10:25</p> <p>17 carcinogenic, so to me it doesn't matter what type it 10:25</p> <p>18 is. 10:25</p> <p>19 Q. Are any of the numbers that Dr. Longo reports 10:25</p> <p>20 here as to Mrs. Bondurant necessary for your opinions as 10:25</p> <p>21 to Mrs. Bondurant? 10:25</p> <p>22 A. No, they're supportive, but not necessary. 10:25</p> <p>23 Q. You said at least a couple of times that, well, 10:25</p> <p>24 Dr. Longo is trying to be specific as to the volume. 10:26</p> <p>25 From your standpoint, Mrs. Bondurant used to use a lot? 10:26</p>	<p style="text-align: right;">Page 64</p> <p>1 identified a threshold exposure to asbestos that must be 10:27</p> <p>2 reached for it to contribute to cause clear cell 10:27</p> <p>3 adenocarcinoma? 10:27</p> <p>4 MRS. O'DELL: Object to the form. 10:27</p> <p>5 A. I'm not, but again I'm not aware of any known 10:27</p> <p>6 safe dose. 10:27</p> <p>7 Q. (By Mr. Hegarty) Are you aware of any published 10:27</p> <p>8 scientific or medical literature that has specifically 10:27</p> <p>9 looked at asbestos exposure and a clear cell 10:27</p> <p>10 adenocarcinoma? 10:27</p> <p>11 MRS. O'DELL: Object to the form, asked and 10:27</p> <p>12 answered. 10:27</p> <p>13 A. I am not aware of that. Again, it would be 10:27</p> <p>14 hard to do because it's so uncommon. 10:27</p> <p>15 Q. (By Mr. Hegarty) Is it your opinion that absent 10:27</p> <p>16 asbestos being in the Johnson's Baby Powder and Shower 10:28</p> <p>17 to Shower that Mrs. Bondurant used, she would not have 10:28</p> <p>18 developed clear cell adenocarcinoma? 10:28</p> <p>19 A. That is not my opinion. 10:28</p> <p>20 Q. So asbestos is not necessary for your 10:28</p> <p>21 opinion -- asbestos exposure by Mrs. Bondurant is not 10:28</p> <p>22 necessary for your opinion as it relates to the cause of 10:28</p> <p>23 her clear cell adenocarcinoma? 10:28</p> <p>24 A. Well, it's the product, which the majority of 10:28</p> <p>25 it contains asbestos. So it's hard for me to separate 10:28</p>
<p style="text-align: right;">Page 63</p> <p>1 A. She did for many years on a near daily basis. 10:26</p> <p>2 Q. Is there some threshold of talc use that you 10:26</p> <p>3 apply to Mrs. Bondurant for you to say that her 10:26</p> <p>4 Johnson's Baby Powder and Shower to Shower is a 10:26</p> <p>5 contributing cause to her ovarian cancer? 10:26</p> <p>6 A. No. 10:26</p> <p>7 Q. Now, Mrs. Bondurant has clear cell 10:26</p> <p>8 adenocarcinoma. Correct? 10:26</p> <p>9 A. Yes. 10:26</p> <p>10 Q. Are you aware of any literature that is 10:26</p> <p>11 reported on a threshold exposure to talc that must be 10:26</p> <p>12 reached to increase the risk of clear cell 10:26</p> <p>13 adenocarcinoma? 10:26</p> <p>14 MRS. O'DELL: Object to the form. 10:26</p> <p>15 A. I'm not aware of any study that's reported on 10:26</p> <p>16 any particular threshold for any type. Several of the 10:26</p> <p>17 studies looked at relative risk of using talc and types 10:26</p> <p>18 of ovarian cancer, some of the -- a few studies 10:27</p> <p>19 separated out clear cell, but because it's such a small 10:27</p> <p>20 portion of epithelial ovarian cancers, the numbers are 10:27</p> <p>21 small in all of those studies. And none of them looked 10:27</p> <p>22 at specific threshold amount that was or was not 10:27</p> <p>23 related. 10:27</p> <p>24 Q. Same type of question as to asbestos. 10:27</p> <p>25 Are you aware of any literature that has 10:27</p>	<p style="text-align: right;">Page 65</p> <p>1 that. 10:28</p> <p>2 Q. Is there anything from your review of Mrs. 10:28</p> <p>3 Bondurant's medical records that [REDACTED] 10:28</p> <p>4 [REDACTED] 10:28</p> <p>5 [REDACTED] 10:28</p> <p>6 MRS. O'DELL: Objection, form. 10:28</p> <p>7 A. I'm not aware of anything in her medical 10:28</p> <p>8 records that [REDACTED] 10:28</p> <p>9 [REDACTED]. 10:28</p> <p>10 Q. (By Mr. Hegarty) To be more specific, has Mrs. 10:28</p> <p>11 Bondurant [REDACTED] 10:29</p> <p>12 [REDACTED]? 10:29</p> <p>13 A. Not as far as I'm aware of in the records that 10:29</p> <p>14 I saw. 10:29</p> <p>15 Q. In the records that you saw, did you see any 10:29</p> <p>16 [REDACTED] 10:29</p> <p>17 [REDACTED]? 10:29</p> <p>18 A. Not on any of the imaging that she had. 10:29</p> <p>19 Q. Did she have any blood or other testing that 10:29</p> <p>20 could show -- that showed [REDACTED] 10:29</p> <p>21 [REDACTED]? 10:29</p> <p>22 MRS. O'DELL: Object to the form. 10:29</p> <p>23 A. I am not aware of any blood test [REDACTED] 10:29</p> <p>24 [REDACTED] 10:29</p> <p>25 [REDACTED]. 10:29</p>

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1 Q. And all that is still accurate? 11:16  
2 A. Yes. 11:16  
3 MR. HEGARTY: Those are all the questions I 11:16  
4 have. 11:16  
5 RECROSS-EXAMINATION 11:16  
6 BY MRS. O'DELL: 11:16  
7 Q. One last follow up. In addition to the 11:16  
8 specific references in your report to asbestos and 11:16  
9 studies that are pinpoint cited or specifically 11:16  
10 referenced in the body of your report, do you also rely 11:16  
11 on all the literature regarding asbestos as included in 11:16  
12 your materials considered? 11:16  
13 A. Yes. 11:16  
14 MRS. O'DELL: Thank you. Nothing further. 11:16  
15 MR. HEGARTY: No further questions. 11:16  
16 COURT REPORTER: Mrs. O'Dell, were you  
17 going to want a copy of this transcript?  
18 MRS. O'DELL: Yes, please.  
19 COURT REPORTER: And Mr. Golomb?  
20 MR. GOLOMB: I do.  
21 (Deposition concluded at 11:16 a.m.)  
22 \*-\*-SIGNATURE REQUESTED\*-\*-  
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1 CHANGES AND SIGNATURE  
2 WITNESS NAME:\_\_\_\_\_ DATE OF DEPOSITION:\_\_\_\_\_  
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1 I, JUDITH WOLF, M.D., have read the foregoing  
2 deposition and hereby affix my signature that same is  
3 true and correct, except as noted above.  
4  
5  
6 \_\_\_\_\_  
7 JUDITH WOLF, M.D.  
8 THE STATE OF \_\_\_\_\_)  
9 COUNTY OF \_\_\_\_\_)  
10 Before me, \_\_\_\_\_, on  
11 this day personally appeared JUDITH WOLF, M.D., known to  
12 me (or proved to me under oath or through  
13 \_\_\_\_\_) (description of identity card or  
14 other document) to be the person whose name is  
15 subscribed to the foregoing instrument and acknowledged  
16 to me that they executed the same for the purposes and  
17 consideration therein expressed.  
18 Given under my hand and seal of office this  
19 \_\_\_\_\_ day of \_\_\_\_\_, 2024.  
20  
21  
22 \_\_\_\_\_  
23 Notary Public in and for  
24 The State of  
25

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY  
3 IN RE JOHNSON & JOHNSON TALCUM )  
4 POWDER PRODUCTS MARKETING, ) MDL NO.  
5 SALES PRACTICES, AND PRODUCTS ) 16-2738 (MAS) (RLS)  
6 REPORTER'S CERTIFICATION  
7 DEPOSITION OF JUDITH WOLF, M.D.  
8 April 25, 2024  
9  
10 I, Gabriela S. Silva, Certified Shorthand  
11 Reporter in and for the State of Texas, hereby certify  
12 to the following:  
13  
14 That the witness, JUDITH WOLF, M.D., was duly  
15 sworn by the officer and that the transcript of the oral  
16 deposition is a true record of the testimony given by  
17 the witness;  
18 I further certify that pursuant to FRCP Rule  
19 30(f)(1) that the signature of the deponent:  
20  
21 \_\_\_\_\_ was requested by the deponent or a party  
22 before the completion of the deposition and that the  
23 signature is to be before any notary public and returned  
24 within 30 days from date of receipt of the transcript.  
25 If returned, the attached Changes and Signature Page  
contains any changes and the reasons therefor;  
\_\_\_\_\_ was not requested by the deponent or a party  
before the completion of the deposition.  
I further certify that I am neither counsel  
for, related to, nor employed by any of the parties or  
attorney in the action in which this proceeding was  
taken, and further that I am not financially or  
otherwise interested in the outcome of the action.  
Certified to by me this \_\_\_\_\_ day of  
\_\_\_\_\_, 2024.  
<%23035,Signature%>